IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

MOHAMED R. AL-'OWHALI,)	
Plaintiff,)	
vs.)	Civil No. 3:25-cv-235-NJR
DANIEL SPROUL and J. HUGHES,)	
Defendant.)	

DEFENDANTS' MOTION FOR EXTENSION OF TIME

Defendants Daniel Sproul and J. Hughes, by and through their attorneys, Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and Assistant United States Attorney Kyle Christopher Oehmke, and for their Motion for Extension of Time, state as follows:

- 1. On or about July 17, 2025, Plaintiff filed a Complaint and ten exhibits against Defendants, totaling 53 pages.
- 2. Following waiver of service by Defendants Sproul and Hughes, their responsive pleadings are presently due October 17 and October 20, 2025, respectively.
 - 3. The undersigned first received authority to represent Defendants on October 1, 2025.
- 4. On that same date October 1, 2025 appropriations for the federal government lapsed, which resulted in the furlough status of various BOP employees, including BOP agency counsel assisting the undersigned on this matter. Coordination with agency counsel is necessary to gather relevant information and prepare a full and complete responsive pleading.
- 5. In light of the foregoing, Defendants request an additional sixty (60) days by which to file their responsive pleading(s).

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This request for an extension of time is made in good faith and is not made for any improper purpose.

WHEREFORE, for the foregoing reasons, Defendants pray the Court grants their Motion for Extension of Time, whereby the Court allows an additional sixty (60) days --- up through and including December 19, 2025 --- by which to file their responsive pleading(s). Defendants further pray for all other relief the Court deems just and proper under the circumstances.

Respectfully submitted,

STEVEN D. WEINHOEFT United States Attorney

s/ Kyle Christohper Oehmke

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CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2025, I electronically filed the foregoing

NOTICE OF APPEARANCE AND DESIGNATION OF COUNSEL

with the Clerk of Court using the CM/ECF system and I hereby certify that I mailed the document, via the United States Postal Service, to the following non-registered participant:

ADDRESS: Mohamed R. al-'Owhali

> Reg. No. 42371-054 Florence High USP Inmate Mail/Parcels P.O. Box 7000 Florence, CO 81226

> > s/ Kyle Christohper Oehmke KYLE CHRISTOPHER OEHMKE Assistant United States Attorney